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ATTORNEYS FOR DEFENDANT  
BEIJING SHOURONG FORWARDING SERVICE CO. LTD.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THELMA SHIPPING CO. LTD.,

Plaintiff,

-against-

BEIJING SHOU-RONG FORWARDING SERVICE  
CO. LTD. a/k/a BEIJING SHOURONG  
FORWARDING SERVICE CO. LTD.,

Defendant.

08 Civ. 1804 (PAC)

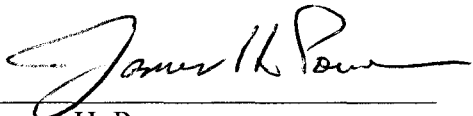
**NOTICE OF MOTION**

**PLEASE TAKE NOTICE THAT** upon the Affidavit of James H. Power dated March 27, 2008, and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant Beijing Shourong Forwarding Service Co. Ltd. will move this Court, before the Honorable Paul A. Crotty, United States District Judge, at 500 Pearl Street, Courtroom 20C, New York, New York, on a date to be set by this Honorable Court, for an order pursuant to Rule E(7)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, directing (a) Plaintiff Thelma Shipping Co. Ltd. to give security to the Defendant for the damages demanded in the Defendant's counterclaim within 10 days from the

issuance of the order; and (b) directing such other and further relief as the Court may deem proper. °

Dated: New York, New York  
March 27, 2008

HOLLAND & KNIGHT LLP

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